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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**WILLIS TOWERS WATSON US LLC'S OBJECTION TO THE APPLICATION OF  
THE UNITED STATES TRUSTEE FOR AN ORDER AUTHORIZING THE  
UNITED STATES TRUSTEE TO CONDUCT A 2004 EXAMINATION OF  
WILLIS TOWERS WATSON**

Willis Towers Watson US LLC (“WTW”) states as follows in support of its objection (the “**Objection**”) to the *Application of the United States Trustee for an Order Authorizing the United States Trustee to Conduct A 2004 Examination of Willis Towers Watson* [Docket No. 1392] (the “**Application**”).

**BACKGROUND**

1. On July 13, 2022, (the “**Petition Date**”), the above-captioned debtors (the “**Debtors**”) filed voluntary petitions under Chapter 11 in this Court.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

2. On November 17, 2022, the United States Trustee (the “**US Trustee**”) filed the Application.

3. The Application seeks information regarding WTW’s role in the Debtors’ bankruptcy case.

### **OBJECTION**

4. On December 12, 2022, WTW produced documents sought in the Application to the US Trustee. WTW has cooperated with the US Trustee’s document requests in the Application.

5. Accordingly, the UST agreed to extend the deadline for WTW to file its objection to the Application three times to December 2, 2022 at 4pm ET [Docket No. 1446], then to December 13, 2022 at 4pm ET [Docket No. 1613], then to December 20, 2022 at 4pm ET [Docket No. 1706], and later to January 5, 2023 at 4pm ET [Docket No. 1774] (the “**Objection Deadline**”). This Court approved each request to move the Objection Deadline.

6. WTW’s position is that the production of documents to the US Trustee renders the Application moot.

7. Nevertheless, out of an abundance of caution, WTW files this Objection to reserve its rights to supplement or amend its Objection if necessary.

### **RESERVATION OF RIGHTS**

WTW reserves all of its rights to supplement or amend this Objection and raise additional issues with the Application at the hearing, and present evidence at the hearing.

**CONCLUSION**

**WHEREFORE**, for the reasons set forth herein, WTW respectfully requests that the Court deny the relief requested in the Application as it is moot, and grant such other and further relief as may be just and proper.

Dated: January 5, 2023

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